

ATTACHMENT B
AFFIDAVIT OF BUREAU OF FEDERAL BUREAU OF INVESTIGATION
SPECIAL AGENT CAMERON M. HEATH, JR.

I, Cameron M. Heath, Jr., Special Agent (“SA”) of the Federal Bureau of Investigation (“FBI”), being first duly sworn, do hereby depose and state the following:

1. I am employed as a SA with the FBI. I have been employed as a Special Agent since September 2015. I am currently assigned to the FBI Kansas City Division, Springfield Resident Agency’s Violent Crime Task Force (“VCTF”). As a Special Agent of the FBI, I am authorized to investigate violations of laws of the United States, and I am a law enforcement officer with authority to execute arrest, search, and seizure warrants under the authority of the United States. I have participated in a wide variety of criminal investigations, to include bank robbery, commercial robberies, drug and gang crimes, crimes against children, white collar crimes, and other violent and non-violent crimes. Additionally, I have participated in the preparation and/or execution of many searches and arrests.

2. This affidavit is in support of a criminal complaint and arrest warrant for Justin Lee WHITE, for the crime of interstate communications with a threat to kidnap or injure in violation of Title 18, United States Code, Section 875(c).

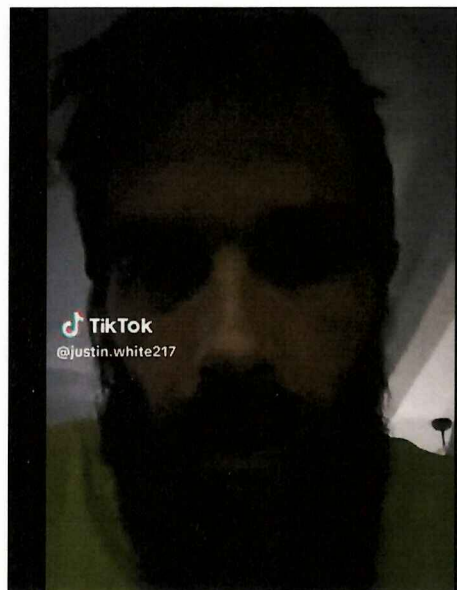
3. The information in this affidavit is information known to me as a result of my participation in this investigation or is information that has been communicated to me by other law enforcement investigators or witnesses, involved in this investigation. The dates and times in this affidavit are approximate. Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for this criminal complaint, I have not described all the relevant facts and circumstances of which I am aware.

STATUTORY AUTHORITY

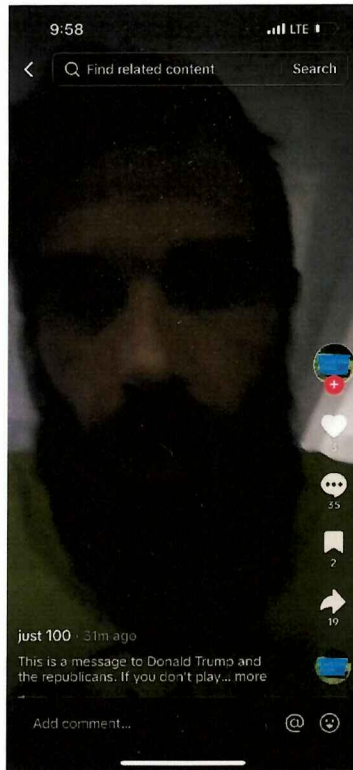
4. 18 U.S.C. § 875(c) prohibits any person from transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

PROBABLE CAUSE

5. On July 31, 2024, the Springfield, Missouri, Police Department (“SPD”), received a tip of a TikTok video that contained threats to kill “Republicans” and “cops.” The tipster of the video was from the unknown user of Instagram account, “iamzeroedin2.” The unknown tipster included a copy of the TikTok video to SPD. The TikTok video was posted on TikTok by the TikTok account with the username @justin.white217, and appeared to have been posted to TikTok on or about July 31, 2024. Below is a screenshot from the reported video showing the TikTok username.



Below is another screenshot from the reported video showing the caption of the video that indicates that the video is directed at “Donald Trump,” and “republicans.”



Through SPD resources, SPD investigators were able to confirm the identity of the user and sole individual of the TikTok video as Justin Lee WHITE, date of birth November 9, 1987, of Springfield, Missouri. WHITE was a known individual to SPD, as SPD was aware that WHITE had posted previous, similarly threatening videos on social media. Specifically, on May 20, 2023, TikTok submitted an online tip to the FBI National Threat Operations Center (“NTOC”), pertaining to threats towards law enforcement by TikTok user “justinwhite2971.” The video provided to the FBI was of WHITE, who posted the video to his TikTok account that stated, “Police are no longer safe in public when I see them. I’m going to harass them. I’m going to attack them. I’m going to get in their face. I’m going to put my fucking hands on them. I’m going to punch them. I’m going to attempt to take their fucking gun and shoot them with it. All law enforcement across the US better watch out for this face right here because I’m going to start whooping your ass for fun. I’m going to be the first to start taking action against law enforcement.”

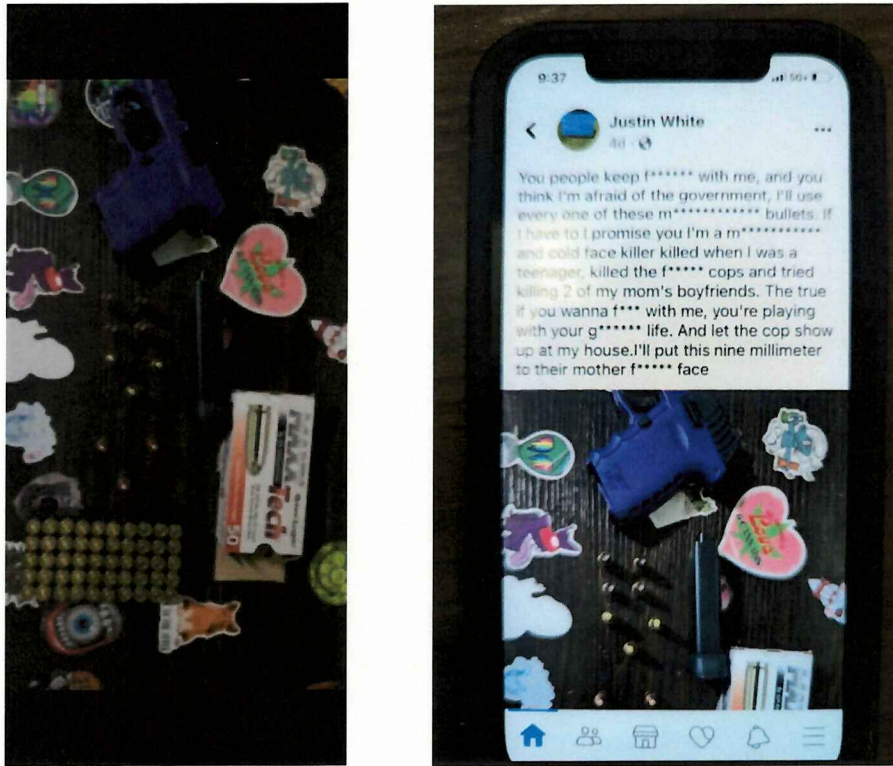
Upon the FBI's receipt of the aforementioned TikTok video of WHITE, the FBI disseminated the information to the SPD for their awareness and any further action SPD deemed necessary.

6. On August 1, 2024, SPD Detective Chris Howery provided me with a copy of the TikTok video in question that was posted by the @justin.white217 account. I watched and listened to the video in its entirety. During the review of the video, WHITE, who could be seen sitting in front of a camera, stated, "This goes to every Republican out there. You don't start playing fair with them votes, I'll start showing up with a gun, I promise you. I'll show you what real fucking violence is, and I'm not afraid to kill you, or a fucking cop. So, if you want to play dirty at the votes this year, in 2024, just remember, where I come from, we get physical. So, if you Republicans don't play fair, there will be guns and violence involved this year."

7. On August 26, 2024, I located and reviewed WHITE's publicly available Facebook account page. The account had a user URL of "JUSTIN.WHITE.395017." I observed that WHITE had made multiple posts on or about August 22, 2024, that contained threats to injure and or kill law enforcement officers. The first post I observed stated, "So the next pathetic a** Green County cup [sic], I found parked outside my house. You're catching these mother f***** hands for no reason, just for being parked outside my house. I'm gonna s***** you out of your cop car and I'm gonna beat the f***** life out of you for not doing your f***** job." Based upon my training and experience, I believe that WHITE's aforementioned post contains a threat to injure a Greene County, Missouri, Sheriff's Office ("GCSO") deputy.

8. In another post, also made on or about August 22, 2024, WHITE wrote, "You people keep f***** with me, and you think I'm afraid of the government, I'll use every one of these m***** bullets. If I have to I promise you I'm a m***** and cold face killer killed when I was a teenager, killed the f***** cops and tried killing 2 of my mom's boyfriends.

The true if you wanna f*** with me, you're playing with your g***** life. And let the cop show up at my house. I'll put this nine millimeter to their mother f***** face.” WHITE included, with the post, a photograph that appeared to depict a firearm, a magazine, and ammunition. Screenshots of the post are below:



9. In another post, also made on August 22, 2024, WHITE wrote, “You m*****, in springfield, missouri, think i’m playing around with you. I’ll shoot and kill you’re a** just like I will. The m***** cops keep messing with my vehicles and watch me kill somebody.”

10. On August 26, 2024, I obtained a federal search warrant (24-SW-2193-DPR) to search WHITE’s residence, located in Springfield, Greene County, Western District of Missouri, to look for electronics and further evidence of the crime of interstate communications with a threat to kidnap or injure.

11. On August 29, 2024, investigators with the FBI executed the aforementioned search warrant on WHITE's residence. Upon arriving at the residence, members of the FBI announced their presence and requested all occupants exit the home. At that point, WHITE and his fiancée, Rebecca Parsons ("PARSONS"), exited the front door of the residence. As WHITE exited he had a phone in one of his hands. WHITE placed the phone on the front porch of the home, and continued walking towards FBI investigators.

12. WHITE was detained by members of the FBI, and told that they were executing a search warrant on his residence. WHITE was transported to SPD Headquarters for an interview.

13. At approximately 8:15 a.m., SPD Detective Howery and I contacted WHITE in an interview room. We introduced ourselves, and explained to WHITE that we were investigating him due to some online, threatening communications that he had made.

14. Prior to asking him any guilt-seeking questions, I read WHITE his *Miranda* rights from the FBI's Advice of Rights Form. WHITE stated that he understood his rights.

15. During the post-*Miranda* interview of WHITE, WHITE stated that his anger and hatred towards "cops" were a result of videos he watched on TikTok and YouTube, where cops were aggressive or violent towards members of society. WHITE stated that when he was 16 or 17 years old, while living in St. Louis, Missouri, WHITE got into a shooting with a police officer. He claimed he "beat" the case because the police officer shot at him first.

16. WHITE was asked if there were any weapons inside his residence that would be located during the search of his home. WHITE admitted that there was a purple and black, SCCY, 9mm pistol in the residence, and that it would be located in the living room, on the table. WHITE estimated that there would be approximately 100 9mm bullets inside the table, near where the gun was located. WHITE also admitted to being a habitual user of marijuana and that he smoked

approximately “6 joints a day”.

17. WHITE was shown two of the August 22, 2024, Facebook posts that were referenced above. WHITE admitted that he had made said Facebook posts, and that the Facebook account with the URL of “JUSTIN.WHITE.395017” was his Facebook account. WHITE also identified the black and purple handgun depicted in one of the posts as the handgun that investigators would find while searching his residence.

18. WHITE stated he was frustrated and angry prior to making the posts on Facebook because he believed he observed a police officer in a marked patrol vehicle stopped at his residence and looking at his vehicles. WHITE was upset because the cop had no reason to stop at his residence and look at his vehicles.

19. WHITE admitted that he “fucked up” and should not have made the posts threatening to kill or injure the cop. WHITE understood how the statements he made, along with the photo of the purple and black handgun, and the box of ammunition would be perceived as threatening.

20. During the interview of WHITE, the investigators who were searching the PREMISES, located the black and purple, SCCY, 9mm handgun, bearing serial number C327984, on the table in the living room. The SCCY handgun was unloaded but near it was a magazine loaded with 9mm ammunition. In addition, investigators located a box containing fifty Maxx Tech, 9mm rounds, which was located inside the table, as WHITE described. There was an additional thirteen 9mm rounds inside the table as well. A photo of the SCCY handgun that was seized at the PREMISES can be seen below, as it was when it was seized.



21. WHITE was also shown the TikTok video that SPD received on July 31, 2024, in which WHITE threatened to kill “Republicans” and “cops.” WHITE watched the video in its entirety. WHITE admitted the video was posted by him, on his TikTok account, but WHITE could not recall when the post was made.

22. WHITE recalled making the TikTok post because he had just gotten in an argument with an unknown person on TikTok about politics. WHITE could not remember what the argument was about specifically, but WHITE said he was not a “political” person. WHITE stated he was frustrated by his argument with the unknown person, which is why he made the TikTok video about killing “Republicans” and “cops”.

23. Following WHITE’s interview, he was transported to the Greene County, Missouri, Jail, where he was placed on a federal hold in anticipation of a federal complaint.

24. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against Justin Lee WHITE, for violation of 18 U.S.C. § 875(c), that is, interstate communications with a threat to kidnap or injure.

I swear/affirm that the above information is true and correct to the best of my knowledge and belief.



CAMERON M. HEATH, JR.
Special Agent
Federal Bureau of Investigations

Subscribed and sworn to before me via telephone on the 30th day of August, 2024.



HONORABLE WILLIE J. ELLIS, JR.
Chief United States Magistrate Judge
Western District of Missouri